

JP:DAS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MO7-0046

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 18 U.S.C. § 2113(d))

MICHAEL FARRELL,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

HERMINIO RODRIGUEZ, Jr., being duly sworn, deposes and states that he is a detective with the New York City Police Department currently assigned to the Federal Bureau of Investigation ("FBI") Joint Bank Robbery Task Force ("JBRTF"), duly appointed according to law and acting as such.

Upon information and belief, on or about January 6, 2007, within the Eastern District of New York, the defendant MICHAEL FARRELL did knowingly and intentionally take by force, violence and intimidation, from the person and presence of another, money belonging to and in the care, custody, control, management and possession of a bank or other financial institution, to wit: Chase Bank, the deposits of which are insured by the Federal Deposit Insurance Corporation, and, in so doing, put in danger the life of a person by the use of a dangerous weapon.

(Title 18, United State Code, Section 2113(d))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. Your deponent has been assigned to the FBI JBRTF for approximately six years. I am familiar with the facts contained in this affidavit as a result of my participation in the investigation of the bank robbery discussed in this affidavit, which includes, but is not limited to, my review of bank robbery surveillance photographs, interviews with witnesses, and conversations with other law enforcement personnel assisting with the investigation.

2. As detailed further below, on or about January 6, 2007, the defendant MICHAEL FARRELL robbed Chase Bank, located at 9313 3rd Avenue, Brooklyn, New York.

3. Specifically, a witness observed a white male, later identified as the defendant MICHAEL FARRELL, approximately 5'5" or 5'6", wearing a blue hooded sweatshirt, sunglasses and baseball cap, enter the back with a backpack at approximately 11:30 a.m. He then approached a bank teller window and handed the teller a demand note, which read "Give me the money or you

¹ Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest the defendant, I have not included details of every aspect of this investigation.

die all of you. All hundred & fifty. No dye packs. I worked her[e] before."

4. The teller left the teller window and approached the bank manager in the bank lobby. The defendant followed the teller, and removed from his rear pocket the handle of what appeared to be a weapon.

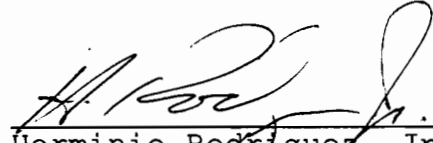
5. The bank teller gave the defendant MICHAEL FARRELL three envelopes of "bait" money containing \$800 in currency.

6. The defendant MICHAEL FARRELL placed the three envelopes containing the \$800 in his backpack and departed the bank.

7. A bank customer who had witnessed the robbery followed the defendant MICHAEL FARRELL a short distance to 381 93rd Street, where he was forcibly detained by the bank customer and others. Law enforcement authorities subsequently arrested the defendant. The defendant was not compliant and struggled with authorities during the arrest process.

8. During a search incident to arrest, law enforcement authorities discovered three envelopes containing \$800 inside the defendant's backpack. Law enforcement authorities also discovered a box-cutter knife in the defendant's possession.


WHEREFORE, your deponent respectfully requests that the defendant MICHAEL FARRELL be dealt with according to law.



Herminio Rodriguez, Jr.
Special Agent
Federal Bureau of Investigation

Sworn to before me this
12 11th day of January 2007

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NOTARY PUBLIC
NEW YORK